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ABSTRACT

The utility of the proposed Program Evaluation Standards to educational practitioners, and the adequacy of some of the standards in addressing issues in evaluation in culturally and linguistically educational environments are discussed, drawing on the author's experience as Director of the Evaluation Assistance Center East in Arlington (Virginia). As it stands, the proposed document is well written and generally clear, but it may be too long and complex for some potential users. The standards as they are written will certainly confirm and support good practices in the evaluation of bilingual education programs. Six are worthy of particular comment. Utility Standard 1 addresses the audience for the standards, and it is recommended that it should mention language minority groups explicitly. With regard to Utility Standard 5, Report Clarity, and Utility Standard 6, the standard on report dissemination, it is again imperative that language minorities be mentioned specifically. Concern for those of limited English proficiency must be built into Propriety Standard 3, Rights of Human Subjects, and Propriety Standard 6, Disclosure of Findings. In a similar way, Accuracy Standard 5, Valid Measurement, should encompass a positive guideline that enjoins evaluators to consider all relevant characteristics of respondents, including language proficiency. (Contains 3 references.) (SLD)

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Testimony presented to
The Joint Committee on Standards for Educational Evaluation
Washington, D.C., May 7, 1993

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Distinguished members of the Joint Committee on Standards for Educational Evaluation:

Thank you for this opportunity to respond to the February 1993 draft of the Program Evaluation Standards. My name is Charlene Rivera; I am a Senior Research Scientist at the George Washington University, and Director of the Evaluation Assistance Center East. I have worked in a range of college, university, and research and evaluation settings, and as a visiting scholar at ETS, worked on the nation-wide NAEP project; however, I will focus my testimony today on issues related to the K-12 educational system, and to the education of linguistically and culturally diverse students and their families.

To set the context for this testimony, let me briefly explain the work of the Evaluation Assistance Center East and the constituencies it serves. The Evaluation Assistance Center East is one of two EACs funded by the Department of Education's Office of Bilingual Education and Minority Language Affairs (OBEMLA) to provide technical assistance on assessment and evaluation to state and local education agencies which receive federal funding to support bilingual education programs. Our work includes on-site and remote provision of technical assistance on a range of evaluation-related issues to state educational personnel and to teachers, coordinators, administrators, and evaluators, in local schools in 27 states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands. We have also worked together with staff from the Office of Bilingual Education and Minority Language Affairs to develop materials to facilitate compliance with the relevant federal evaluation requirements. We also work extensively in the areas of language and academic assessment of students who are English language learners (often referred to as "limited English proficient" students).

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Over 1100 local projects are currently funded by OBEMLA; each of these projects is evaluated annually in keeping with the relevant federal evaluation requirements. Because we at the EAC East work directly with project directors--all of whose responsibilities include oversight of program evaluation, but many of whom have not received extensive training in evaluation--I will begin with a comment regarding the utility of the standards themselves to practitioners. Subsequently, I will comment on the adequacy of six of the standards in accounting for and addressing issues in evaluation in culturally and linguistically educational environments.

1. Utility of the Standards to Practitioners

As noted in the introduction to the draft, the standards are intended to help a range of audiences in understanding, judging, using evaluation. On the positive side, the document as it stands is well written, and generally clear. However, there are still audiences for whom the standards themselves may be daunting merely by virtue of their size and number. In our work in the field, we encounter many project directors who, while well qualified to direct educational programs, have no experience with, and consequently have high anxiety about, guiding a program evaluation. I suspect that for such "reluctant audiences," a brief, even **more** user-friendly introduction to the standards might be useful. What I have in mind is a separate volume that would orient educational practitioners to good evaluation practice, introduce the main categories of the standards, and encourage them to examine the full set as a reference.

Let me reiterate that the writing style of the standards is generally clear, and the use of examples make the document quite accessible. While changes in the standards themselves are not necessarily warranted, some people still react negatively to things they don't already understand, or that they think will be difficult to understand. Supplemental or auxiliary materials, whether developed under the direction of the Committee or developed by third parties, would be of great utility to many educational practitioners.

2. Applicability to evaluation of bilingual education programs

As a whole framework, the standards will certainly support and confirm good practices in the evaluation of bilingual education programs, while I suppose others may, in their testimony,

suggest changes in the organization of the framework, I see nothing in it that warrants alteration. Rather, I will respond to six (6) of the standards in light of the needs, rights, and experiences of students and families who are still in the process of learning English--groups which are large, growing, and will certainly be a major presence in U.S. education and society throughout the time period between the approval of this set of standards and the development of the next revision sometime in the next millennium.

Utility Standard 1: Audience identification

As an educator, I am happy to see that the first standards treated in the document relate to utility of evaluations, and that the very first of these deals with audience identification. In order to further ensure that some audiences which are all too often not identified are included, I would recommend that the needs and rights of language minority individuals and communities be addressed explicitly. While it might be argued that the need to attend to language minority audiences is addressed in the spirit of the standard, I feel strongly that this sizable population ought to be mentioned explicitly. Let me review a few figures with you to substantiate this point; the national demographic data leads me to conclude that **all evaluations** ought to pay specific attention to such real and potential audiences.

Between the 1980 census and the 1990 census, the number of persons 5 years of age or older who reported themselves to be speakers of non-English languages increased by 38% from 23 million to nearly 32 million (Numbers and Needs, vol. 2, no. 4, July 1992). Based on estimates from NELS 88 data, the number of non-English language background children and youth (aged 5 to 17) is nearly 14% (6.3 million) of those aged 5-17 (Numbers and Needs, vol. 2, no. 5, September 1992). According to OBEMLA, at least 2.3 million K-12 students have been identified by states as having "limited" proficiency in English (OBEMLA 1992); since under-identification is a greater problem than over-identification, English language learners in the nation's student body are more numerous than this figure--which already represents more than one in twenty of the nation's 40.5 million students--would suggest. A better estimate that is sometimes discussed is 3.3 million (Stanford Working Group, 1993). These figures suggest strongly that very few, if any, educational evaluations that are undertaken in the lifetime of the

1993 standards will **not** have audiences who speak languages other than English, and whose needs, rights, and perspectives will not be addressed if communication occurs solely in English.

Specifically, I would suggest adding a guideline to standard U1:

> In identifying stakeholders, be certain that all audiences affected by the program and its evaluation are identified and consulted, especially those whose perspectives might be overlooked because of their gender, ethnicity, or language background. Evaluators should make use of translators in cases where the evaluator is unable to communicate in the language(s) of some audiences, for example, parents and/or students who are not proficient in English.

Utility Standard 5: Report Clarity

In relation to standard U5, Report Clarity, ensuring inclusion of linguistic minority audiences in considering the findings of evaluations is again crucial. None of us can clearly understand information reported to us in languages we have not mastered sufficiently for that task. I would emphasize that in relation to this standard, I am not referring only to evaluations of programs that specifically target English language learners, but to **all** evaluations having audiences for whom the English language itself is not the most comprehensible medium. Once again, though this consideration can be inferred from the intent of the standard, including a direct and explicit statement would be appropriate; such a statement might read:

> Evaluation results should be made available in the languages of all interested audiences through verbal explanation or translation at public hearings and through translation of reports or executive summaries of reports into the language(s) of all audiences.

Utility Standard 6: Report Dissemination

Issues discussed in relation to this standard relate to "right to know" audiences and to planning for dissemination that does not exclude those who should be part of the evaluation process at the reporting and responding stage. Evaluators and those responsible for evaluations should be specifically encouraged to ensure that linguistic minority audiences are included in the definition of "right to know" audiences, and that dissemination to language minority communities takes

place in appropriate and approachable contexts. Beyond the issue of using audiences' languages in reporting, evaluators should seek to involve community members in advisory and/or dissemination capacities to ensure that social impediments to dissemination are overcome. Planning for such dissemination and making feedback possible is crucial.

Propriety Standard 3: Rights of Human Subjects

There is both a broad, general concern regarding this standard, and a more practical one. Taking the latter first, language issues ought to be addressed in relation to the guidelines dealing with informed consent, namely F, G, H, and I. Communication with language minorities in general must be in an understandable medium; particular care must be taken when communicating with the home about issues of informed consent. Even if a student from a non-English speaking background has become proficient in communicating and learning in English, one cannot assume that communications sent to the home in English will be understood. Evaluators should be encouraged to work with school personnel knowledgeable about the language backgrounds of students and parents in the community, and to communicate appropriately with them.

I also want to make a more general point; given the added time that consulting with knowledgeable personnel might entail, one can imagine that monolingual evaluators, or multilingual evaluators who are not proficient in one or more of the languages represented by students and families in a given educational setting, might be tempted to exclude linguistically diverse students and families from evaluations. This is not an ethical or acceptable route to take, and I would encourage the Committee to consider adding a general inclusiveness standard indicating that all groups of students who will or could be affected by the results of an evaluation must be fully included.

Propriety Standard 6: Disclosure of Findings

This may all start to sound familiar! Guideline H under the 'disclosure of findings' standards encourages evaluators to "[e]ncourage clients to provide all affected persons with information that is appropriate and timely, and that helps them to be enlightened contributors, consumers, critics, and observers." I would recommend the addition of wording encouraging them specifically to

ensure that complete information is practically and linguistically accessible in comprehensible forms for all relevant audiences.

Accuracy Standard 5: Valid Measurement

The treatment of this standard, as might be expected, is long and detailed; instrument validity per se, however, is not treated in great detail, but rather is dealt with by referring readers to appropriate testing standards. While this is an economical way to deal with the issue, I would suggest shifting one statement listed among the "common errors" to the "guidelines" column, and expanding it to include cognizance of language issues in relation to validity of measurement in particular and of evaluations in general. Namely, I would suggest that "common error" H, "failing to consider characteristics of respondents that may affect their ability to understand or respond to a procedure as implemented," be changed to a positive guideline that enjoins evaluators to consider all relevant characteristics of respondents, including consideration of linguistic appropriateness of measures and procedures. Too often, particularly in educational settings, though certainly in other settings as well, students who are still learning English are either excluded from consideration or inappropriately assessed. In the former case, the validity of program evaluations is compromised because all participants' experiences are not accounted for; in the latter case, data validity is compromised because an extraneous variable--language proficiency--confounds the results.

3. Inclusion and placement of references

Finally, I would add a general comment on the format. While including references at the end of each standard is helpful, the same publications appear repeatedly at the end of various standards. It might be more useful to include a general list of references at the end of the document; annotated references to articles or chapters within books that pertain **directly** to the standard in question might be useful at the end of each section.

Let me close by thanking the Committee for its diligent work in revising the Program Evaluation Standards, and for its efforts to elicit feedback from a wide range of constituencies. As technical assistance providers, we appreciate having access to good materials to use in providing assistance

regarding evaluation. The 1993 Program Evaluation Standards will certainly benefit our efforts greatly. I hope that you will seriously consider the recommendations made in these remarks. If there is any way that I or my staff can assist you in addressing the needs of culturally and linguistically diverse constituencies to educational evaluations, we will be happy to do so.

Thank you.

References

Office of Bilingual Education and Minority Language Affairs. (1992). *The condition of bilingual education in the nation: A report to the Congress and the President* Washington, D.C.: Author.

Numbers and Needs: Ethnic and Linguistic Minorities in the United States. Washington, D.C.: Author. Volume 2, number 4, July 1992; Volume 2, number 5, September 1992.

Stanford Working Group on Federal Education Programs for Limited-English-Proficient Students. (1993) 'Remaking Bilingual Education: The Second Generation.' Paper presented at the American Educational Research Association, Atlanta, GA, April 15, 1993.

Postscript: In addition, CR pointed out that none of the illustrative cases included in the document dealt with educational programs serving English language learners; she recommended that one or more be included.